

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

TRIVEL, INC.

Plaintiff,

**Civil Action No. 2-25-cv-10190-SKD-CIv.
Hon. Susan K. DeClerq**

Tech Smart USA, Inc., et al.

Defendants.

STIPULATION OF VOLUNTARY DISMISSAL

NOW COME the Parties, through counsel, and hereby stipulate pursuant to Fed. R. Civ. P. Rule 41(a)(1)(ii) that this action be and hereby is DISMISSED as settled, each party to bear its own costs. Either party may seek to reopen the case in the event of a violation of the settlement agreement.

Dated: June 19, 2025.

Respectfully submitted,

/s/ Daniel M. Press
Daniel M. Press, Va. Bar No. 37123
dpress@chung-press.com
Chung & Press, P.C.
6718 Whittier Avenue/Suite 200
McLean, VA 22101
703-734-3800
703-734-0590 (fax)

/s/ Kurt O'Keefe (by D Press w/
permission)

Kurt O'Keefe P30718
Local Counsel for Plaintiff
1254 Woodbridge Street
St. Clair Shores MI 48080
313-962-4630
koklaw@gmail.com

Counsel for Plaintiff

/s/ Marc Sackin (by D Press w/
permission)

Marc Sackin
MORGAN STARR SACKIN, PLLC
Attorneys for Defendants
208 W. Park Street
Lapeer, MI 48446
(810) 664-9908
Email: msackin@starrsackin.com

Counsel for Defendants